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April 28, 2008
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
Re: Comments on Broadcast Localism; Docket 04-233

Dear FCC:

I am the technical lead of a new applicant for a full power station "Flint Acorn" in last October's window. We are in an MX group with 5 others. Our application is the only one promising local programming. Several others are asking for main studio waivers. More others are not asking for waivers now, but their history shows they ask for them later. In all other aspects, we are ready to build and could probably be in the air in a few months.

Flint is an old manufacturing city with a depressed economy. The only local non-commercial radio we have is one college LPFM station. There are several full power NCE stations licensed to Flint and its neighbors including Burton, but none of them carry any local programming.

Main studio waivers are a major threat to true community radio, and should be granted only in rare situations, but there are some circumstances where there is a true need.

The existing abuse of main studio waivers could be the single biggest factor leading to loss of localism in non-commercial radio.

I am proposing an alternative approach, the "composite station", that I believe meets the true need now met by main studio waivers, but does not allow the abuse that is so prevalent now.

As an example, consider the Adirondack region of New York. It is

consistent with this proposal to consider Saranac Lake, Lake Placid, Tupper Lake, Speculator, Old Forge, Keene, and several others to be a single region.

The Adirondack region has an area of about 24000 sq-km, and a year-round population of about 130000, that grows to about 200000 at the peak of vacation season. The area is so large that a single transmitter, even at 100000 watts with an excellent location, could not adequately cover the area.

The mountainous terrain further limits coverage, so the only practical way to cover the area is a transmitter in each village. Transmitters cannot be placed on mountain tops because of "forever wild" wilderness restrictions.

Clearly, any one village cannot support a full time main studio, but the region as a whole has as many people as a mid-sized city, which can easily support one real community radio station, that is truly Adirondack. The largest village in the Adirondack region (Saranac Lake) has a population of about 5000.

A single main studio near the center of the region could meet the local main studio requirement for all of them. The local programming requirement would apply to the composite, not to each individually.

A main studio in a nearby city such as Albany, Watertown, or Burlington would not qualify. This is important. The rural areas do not identify with the nearby cities. Sometimes they resent the intervention.

Actually, each of those villages in the Adirondack region could support its own studio, a single room at a community center, but not full time. They would have trouble individually meeting a local programming requirement, but as a group they could do it easily, and have a "station" that is uniquely Adirondack.

In this case, there does need to be a way to consolidate, but a simple main studio waiver is not the answer. Main studio waivers as we have now often marginalize the community being served by the satellite

station. Some of them could support a main studio except they are blocked by the bigger station serving them.

I propose the concept of a "composite station", where several stations are effectively treated as one. Instead of considering their individual coverage areas, consider the combined coverage area as a unit. Then the composite can have a single main studio, and most regulations regarding localism can treat the composite as a single station.

To qualify as a composite station, the areas being combined must be similar in culture and geographically located in a region that is thought of as a single region, and have a relatively low population. An urban center outside of the region specifically does not qualify as part of a rural composite.

To apply, all stations that want to be members of the composite would so indicate on their application, or apply like they do for a main studio waiver. Instead of having one main station, several satellites, and several repeaters, all would be considered to be members of the composite, as equals. Adding or removing a station would require a single application, but would apply to all members of the composite.

A composite station could have more than one main studio, but that should not be required. Individual stations within the composite could have some of their own programming local to their village, but it should not be required.

Another place the composite station concept could apply is in an urban situation where it is impossible to find a large opening that covers the entire metropolitan area, so they use two stations or repeaters. Like the rural composite, it is a region with a distinct single identity and culture. In this case, the preferred approach would be a single high power station, but circumstances make coverage with a single transmitter impossible. If they are able to cover the region with two or three transmitters instead, that should be allowed and also considered to be a composite station.

Main studio waivers, as now exist, should be terminated, and the ones that qualify should be converted into composite stations.

In summary, I propose the elimination of the main studio waiver concept, and introduction of a new "composite station" concept to meet the needs currently met by main studio waivers.

If the "composite station" concept cannot be adopted as proposed, at least it can provide guidelines to determine which main studio waivers are granted and allowed to continue.